

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ Delta, LLC,
Plaintiff,

v.

CommScope Holding Company, Inc., *et al.*,
Defendants.

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED



DECLARATION OF TY WILSON

I, Ty Wilson, state as follows in support of Plaintiff TQ Delta, LLC's Reply in Support of Its Motion for Summary Judgment of No Breach of Any FRAND Obligations (Family 3 and Family 9A Non-Essential Patents):

1. I am an attorney at the Davis Firm, P.C. and counsel of record for Plaintiff TQ Delta, LLC ("TQ Delta"). I am a member of good standing of the State Bar of Texas. I have personal knowledge of the facts set forth in this Declaration.

2. Exhibit H is a true and correct highlighted and excerpted copy of the Expert Report of Jonathan D. Putnam dated August 29, 2022.

3. Exhibit I is a true and correct highlighted and excerpted copy of the ITU-T's *Understanding patents, competition & standardization in an interconnected world*, which may be found at <https://www.itu.int/en/ITU-T/ipr/Pages/Understanding-patents,-competition-and-standardization-in-an-interconnected-world.aspx>.

4. Exhibit J is a true and correct highlighted and excerpted copy of the Expert Report of Stephen L. Becker, Ph.D. dated November 11, 2022.

5. Exhibit K is a true and correct highlighted copy of the ITU-T's Common Patent Policy, which may be found at <https://www.itu.int/en/ITU-T/ipr/Pages/policy.aspx>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 17th day of January, 2023, in Dallas, Texas.

/s/ Ty Wilson
Ty Wilson